

EXHIBIT A

UNITED STATES U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SAN ROCCO THERAPEUTICS, LLC,	:	
	:	CASE NO. 1:21-cv-08206 (VSB)
Plaintiff,	:	
	:	
-against-	:	
	:	
MEMORIAL SLOAN-KETTERING	:	
CANCER CENTER and SLOAN-	:	
KETTERING INSTITUTE OF CANCER	:	
RESEARCH,	:	
	:	
Defendants.	X	

**PLAINTIFF’S UNOPPOSED MOTION TO WITHDRAW ITS MOTION
FOR LEAVE TO FILE SECOND AMENDED COMPLAINT AND TO DISMISS THE
CLAIM FOR FRAUDULENT INDUCEMENT CONTAINED THEREIN WITH
PREJUDICE**

Currently pending before the Court is Plaintiff’s motion filed June 23, 2022 (Dkt. 67) for leave to file a second amended complaint to add a claim of fraudulent inducement. In light of recent developments and negotiations between the parties, Plaintiff respectfully moves the Court to permit withdrawal of that motion, and to dismiss Plaintiff’s claim for fraudulent inducement contained therein with prejudice. Plaintiff has met and conferred with Defendants and Defendants consent to this motion and the withdrawal and dismissal with prejudice that it proposes.

Filed herewith is a Proposed Order permitting withdrawal of Plaintiff’s motion and dismissal of Plaintiff’s claim for fraudulent inducement contained therein with prejudice.

Dated: December 2, 2022

Respectfully Submitted,

FOX ROTHSCHILD LLP

/s/ Wanda French-Brown

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